



Wiggin and Dana LLP
437 Madison Avenue
35th Floor
New York, New York
10022
www.wiggin.com

Lawrence Peikes
203.363.7609
212.551.2888 fax
lpeikes@wiggin.com

VIA ECF

June 25, 2021

Hon. Philip M. Halpern
U.S. District Judge
U.S. District Court for the
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application granted. Pre-motion letter due 7/23/2021.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "B. M. Halpern".

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 28, 2021

Re: Osekavage v. Sam's East, Inc., et al.
No. 19-cv-11778 (PMH)

Dear Judge Halpern:

This Firm represents the defendants in the above-referenced employment discrimination case. We respectfully submit this joint request, on behalf of all parties, for an extension of the deadline for defendants to submit their pre-summary judgment motion conference letter by twenty-three days from June 30, 2021 to July 23, 2021. In accordance with the Court's Individual Practices Rule 4(E), defendants provided plaintiff with their Local Rule 56.1(a) statement of undisputed material facts on June 24, 2021. Plaintiff represents that she will need three weeks, to July 16, 2021, to prepare her response and counterstatement of facts. Defendants request an additional week to review plaintiff's response and to prepare their pre-motion letter.

This is the first request for an extension of this deadline. The parties make this request in good faith, motivated by a desire to engage in efficient litigation, avoid unnecessary burden and expense, and serve the interest of judicial economy. The parties respectfully request that the Court grant this request.

Respectfully submitted,

/s/ Lawrence Peikes
Lawrence Peikes (LP-2478)
Joshua J. Wyatt (JW-3642)

cc: Jonathan R. Goldman, Esq. (via ECF)
24860\17\4818-8734-7952.v1